

# **Plaintiffs' Exhibit 7**

## **(Redacted)**

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA, )  
et al., )  
Plaintiffs, ) Case No.  
vs. ) 1:23-cv-  
GOOGLE LLC, ) 000108-LMB-  
Defendant. )

Wednesday, September 6, 2023  
9:59 a.m.

Remote Zoom Videotaped Deposition of  
KRISTY KOZLOWSKI, held before Stacey L.  
Daywalt, a Court Reporter and Notary Public of  
the District of Columbia.

Job No. CS6078882

1                   Q.     And you understand that you are  
2     testifying pursuant to a subpoena issued by  
3     Google in this case.  Correct?

4                   A.     Yes.

5                   Q.     And did you review any documents in  
6     preparation for your deposition today?

7                   A.     I've reviewed documents with counsel  
8     related to the topics at hand, the one that is  
9     up in the exhibit share right now, as well as  
10    the subpoena and details around the subpoena.

11                  Q.     Any other documents that you  
12    reviewed in preparation for your testimony  
13    today?

14                  A.     Nothing that we reviewed  
15    necessarily.

16                  There were documents that we've  
17    provided along the way, but did not review them  
18    again.

19                  Q.     Okay.  Why don't you describe your  
20    role at Comcast for me.

21                  A.     I'm the senior vice president of  
22    media, strategy and planning.  What that  
23    entails or encompasses from a responsibility  
24    standpoint is sort of twofold.

25                  I think the first thing to kind of

Page 21

1 share is that our organization is a little  
2 decentralized in that we do have media teams  
3 that sit across both headquarters and  
4 divisions.

5 My role here is responsible for the  
6 planning, buying and execution of all  
7 headquarters media, which is -- primarily  
8 focuses on brand and other key campaigns.

9 Additionally though my team also  
10 sits as a centralized function whereby we are  
11 responsible for building the overall media  
12 capabilities and technologies in which we will  
13 invest in for the total organization for the  
14 planning and buying of media.

15 That also includes the oversight of  
16 our in-house programmatic team that trades on  
17 behalf of all of Xfinity, Comcast Business and  
18 corporate reputation, both headquarters and  
19 divisions.

20 Q. When you said "in-house programmatic  
21 team," what do you mean?

22 A. We have a team of traders that sit  
23 at Comcast as Comcast employees whereby we are  
24 in the platforms trading and bidding and  
25 managing buys directly in the DSPs versus using

1                   ability to deliver an ad in a video environment  
2                   or on a site or with a partner that is serving  
3                   video content.

4                   Q.        And what do you mean when you say  
5                   "in a video environment"?

6                   A.        So online video, I look at if you  
7                   are on the web and you're watching -- if you're  
8                   on ESPN and you're looking at clips from last  
9                   night's football game and there was a pre-roll  
10                   opportunity before you look at the two-minute  
11                   clip in our ad serves, that would be online  
12                   video.

13                   Q.        Is online video all in-stream video?

14                   A.        Yes, I would say so.

15                   Q.        Is online audio another channel for  
16                   Comcast?

17                   A.        Yes, it is.

18                   Q.        And can you explain what online  
19                   audio is.

20                   A.        Online audio is essentially our  
21                   ability to buy media across partners like  
22                   Pandora, Spotify, even podcasting, Sirius, so  
23                   taking what was traditionally radio and the  
24                   broadcast format and allowing us to be able to  
25                   insert our ads digitally for people who might

1                   be listening on their desktop or their mobile  
2                   phone.

3                   Q.        Does Comcast have KPIs for online  
4                   audio?

5                   █           █  
█                   █  
█                   █  
█                   █  
█                   █

10                  Q.        Are you aware of any specific online  
11                  audio campaign that used a acquisition metric?

12                  A.        I'm not.

13                  Q.        For online video, what KPIs does  
14                  Comcast use?

15                  █           █  
█                   █  
█                   █  
█                   █  
█                   █  
█                   █

21                  Q.        What percent of Comcast's online  
22                  video spend is an acquisition message?

23                  A.        Probably over 70 percent.

24                  Q.        Over 70 percent of online video is  
25                  acquisition?

1 A. (Indicating affirmatively.)

2 Q. And for display advertising, do you  
3 have an understanding of the term "open web"?

4 A. Yes.

5 Q. And what is your understanding of  
6 that term?

7 A. The open web is just where  
8 advertisers go in within the DSP platforms to  
9 bid on inventory across all exchanges.

10 Q. And does that differ from walled  
11 gardens?

12 MS. DEARBORN: Form.

13 THE WITNESS: Yeah, I'm not sure I  
14 understand the question.

15 Q. Is the inventory available on the  
16 open web different than the inventory available  
17 in walled gardens?

18 A. Yes.

19 Q. And how is it different?

20 A. Inventory and walled gardens like a  
21 Meta or social is not available on the open  
22 web.

23 Q. I think we discussed earlier the  
24 term "marketing funnel."

25 Do you recall that?

1 A. I do.

2 Q. And what does the term "marketing  
3 funnel" mean?

4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]

8 Q. And what are the different parts of  
9 the funnel?

10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]

14 Q. Are there different business  
15 objectives associated with different parts of  
16 the funnel?

17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]

24 Q. From Comcast's perspective, each  
25 part of the funnel has a different business

Page 251

1 District of Columbia, to wit:

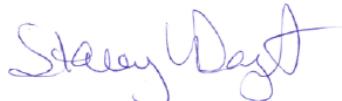
2 I, Stacey L. Daywalt, a Notary

3 Public of the District of Columbia, do hereby  
4 certify that the within-named witness remotely  
5 appeared before me at the time and place herein  
6 set out, and after having been duly sworn by  
7 me, according to law, was examined by Counsel.

8 I further certify that the  
9 examination was recorded stenographically by me  
10 and this transcript is a true record of the  
11 proceedings.

12 I further certify that I am not of  
13 counsel to any of the parties, nor an employee  
14 of counsel, nor related to any of the parties,  
15 nor in any way interested in the outcome of  
16 this action.

17 As witness my hand and Notarial Seal  
18 this 8th day of September, 2023.

20  
21 

22 Stacey L. Daywalt, Notary Public

23 My Commission Expires: 4/14/2026



**ERRATA SHEET****Re:** *United States et al v. Google, LLC***Deponent:** Kristy Kozlowski**Date:** September 6, 2023

<b>Page: line(s)</b>	<b>Transcription</b>	<b>Change To</b>	<b>Reason</b>
9:9	question	request	Transcription error
26:16	Buyer	Buyers	Transcription error
32:24	Sorry	Ms. Dearborn: Sorry	Transcription error
53:3	second bullet, says	second bullet, it says	Omission
63:14	In Comcast's view is	In Comcast's view, is	Omission
65:3-4	I'm going to buy this type of media of this type of media	"I'm going to buy this type of media of this type of media"	Omission
65:18	Comcast is going to buy	Whether Comcast is going to buy	Omission
85:21	Target-ability	Targetability	Transcription error
104:4	Does have a internal	Does have an internal	Transcription error
113:11	Is from 2017 update	Is from a 2017 update	omission
119:12	The YouTubes	YouTube	Transcription error
122:1	View-ability	Viewability	Transcription error
135:3	To slide	To the slide	Omission
138:17	Advertories	Advertisorials	Transcription error
184:11	Used a	Used an	Transcription error
199:2	View-ability	Viewability	Transcription error
203:13	document prepared	document was prepared	Omission
213:4	Target-ability	Targetability	Transcription error
213:18	Target-ability	Targetability	Transcription error